

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION
3:22-md-03036-RJC-DCK**

**IN RE: GARDASIL PRODUCTS LIABILITY
LITIGATION**

MDL No. 3036

**THIS DOCUMENT RELATES TO
ALL CASES**

JOINT PROPOSED AGENDA FOR DECEMBER 14, 2022, CONFERENCE

Pursuant to the Court's Second Pretrial Order, dated October 13, 2022, and the Court's Text Order, dated November 4, 2022, the parties jointly submit the following proposed Agenda for the Second Pretrial Conference on December 14, 2022:

- I. Scheduling of Future Conferences for 2023
- II. Pleadings
 - a. Agreed Deadline for Amending Pleadings
 - b. Agreed Deadline for Filing Counterclaims, Crossclaims, and Third-Party Complaints
 - c. Deadline for Merck's Federal Rule of Civil Procedure 12 Motions
 - d. Timing and Format of Merck's Answer (i.e., whether Merck shall file a single general denial and preliminary list of affirmative defenses, or separate answers to individual complaints)
- III. Parties' Proposed Discovery Plans
- IV. Discovery Disputes and Coordination of California State Court Litigation with MDL

- V. Fact Sheets and Related Orders
- VI. Additional Matters
 - a. Proper Party Order
 - b. Agreed Waiver of Service Order
 - c. Agreed Direct Filing Order
 - d. Protective Order
 - e. ESI Order
 - f. Science Day
- VII. Plaintiffs' Proposed Committees (ECF No. 32)

Date: December 2, 2022

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